

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|----------------------------------|---|---|
| JOHN NOAKES, |) | Case No. 1:21-cv-01776 |
| |) | |
| Plaintiff, |) | Judge Pamela A. Barker |
| |) | |
| v. |) | <u>DEFENDANT'S UNOPPOSED</u> |
| |) | <u>MOTION FOR ECF 29-8, 29-9, 29-10,</u> |
| CASE WESTERN RESERVE UNIVERSITY, |) | <u>29-20, 29-21, 29-23, 29-24, AND 29-27</u> |
| <i>et al.</i> , |) | <u>TO BE PLACED UNDER SEAL</u> |
| |) | |
| Defendants. |) | |

On December 7, 2021, Plaintiff filed his Notice of Filing of Exhibits in Support of Motion for Preliminary Injunction [ECF 29], which contained copies of various exhibits and documents, including, for example, confidential submissions by non-party medical students as part of an internal School of Medicine process. Similar to the Tumblr posts, which Defendant moved to file under seal [ECF 13] and which this Court permitted to be filed under seal [ECF 14], in order to protect student identities and the integrity of the confidential processes within the School of Medicine,¹ and given the sensitive nature of the information contained in the records, Defendant respectfully requests that this Court place ECF 29-8 (April 15, 2021 Emails from Student), 29-9 (April 15, 2021 Emails from Student), 29-10 (April 16, 2021 Text from Student), 29-20 (Early Concerns), 29-21 (May 15, 2021 Text Messages), 29-23 (May 25, 2021 Email), 29-24 (May 26, 2021 Email), and 29-27 (August 3, 2021 Emails) under seal. The undersigned counsel conferred

¹ Even though student names are redacted, the nature of the communications/submissions and the language contained in these documents may reveal information about the identities of the student authors, and, these communications/submissions were sent by non-party students through confidential and internal School of Medicine processes, such as through Society Deans and Early Concerns Reporting processes.

with Plaintiff's counsel on December 7, 2021, and Plaintiff's counsel represented that Plaintiff does not object to this Motion or to these documents being placed under seal.

For these reasons, Defendant respectfully requests that this Court place ECF 29-8 (April 15, 2021 Emails from Student), 29-9 (April 15, 2021 Emails from Student), 29-10 (April 16, 2021 Text from Student), 29-20 (Early Concerns), 29-21 (May 15, 2021 Text Messages), 29-23 (May 25, 2021 Email), 29-24 (May 26, 2021 Email), and 29-27 (August 3, 2021 Emails) under seal.

Respectfully submitted,

/s/ Amanda T. Quan

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CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2021, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Amanda T. Quan
One of the Attorneys for Defendant

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